

**MA TELRIC - DTE 01-20**

**Alternative (Low Cost) Hot Cut Option**

Background. In its July 11, 2002 Order (at 486), the Department directed Verizon “to develop a less costly alternative for CLECs that Verizon would offer as an alternative to the hot cut process modeled in Verizon’s NRCM . . . . This two-tier approach places the burden on each CLEC to decide which hot cut process is appropriate given its resources and priorities.”

Response. Verizon MA has complied with the Department’s order for a new, less costly Hot Cut alternative through the deployment of a completely new option. Tariff rates, terms and conditions associated with this option are contained in Book 7 of this compliance filing (D.T.E Tariff No. 17, Part B, Section 5 and Part M, Section 1). This new option makes extensive use of a web-based communications and coordination tool called WPTS (“Wholesale Provisioning Tracking System”) and will significantly reduce the cost of a Hot Cut for CLECs who have been certified as WPTS users. WPTS, described in more detail below, is a web-based e-commerce system developed by Verizon that is capable of providing sufficient status information and enabling near real-time interactive communication between certified CLEC users and Verizon MA’s RCCC and CO Frame forces so as to reduce coordination costs. Additionally, the WPTS Hot Cut option (“Option II”) will include virtually all of the communication between CLEC and Verizon MA teams that is essential to ensuring end-user service continuity - without labor-intensive coordination telephone calls.

Deployment of the WPTS Hot Cut option requires action and commitments of CLECs as well. While Option I will continue to be available to all CLECs, in order to be eligible to use Option II, CLECs must become certified WPTS users. Once certified, CLECs must continue to demonstrate commitment to using the system as the vehicle associated with all routine communications surrounding the preparation and execution of Hot Cuts. While WPTS is designed to be used for a vast majority of Hot Cut applications, certified CLECs may choose to order Option I when the intricacies or service requirements of a particular order makes that option more desirable. Further, failure of a certified CLEC user to utilize the system, as designed, for the vast majority of their orders will result in Verizon MA reverting to Option I pricing for such CLECs.

WPTS is a web-based communications and notification tool. The system was created to assist the CLEC community and the Regional CLEC Coordination Center Personnel (“RCCC”) in the administrative and preparatory coordination functions associated with

Hot Cuts. The system is designed to assist the CLEC and the RCCC to easily organize Hot Cut Orders to ensure that all key steps of the Hot Cut process are properly completed and all necessary communication between the CLEC and Verizon MA work teams occurs effectively.

WPTS is designed to improve processes and efficiencies for both the CLEC and RCCC by reducing manual work and phone calls. Additionally, through the availability of near real-time information as well as interactive communication with Verizon MA, WPTS allows the CLEC to be more in control of the entire Hot Cut, and thus transfers accountability for certain trigger events and key communications directly to the CLEC.

These improvements in information availability, enhanced control and effective interactive communications are available only when a CLEC makes use of all WPTS features. Since the system identifies facility mismatches, IDLC, and dial tone problems that could result in a missed Due Date and mechanizes the Go Ahead, Cut OK, Cut Failed and Confirm notification, it is vital – and indeed a requirement of the WPTS Hot Cut process - that CLECs take full advantage of WPTS capabilities.

The WPTS Hot Cut Web-Based System contains:

- ?? A database of all Hot Cut orders for the particular CLEC.
- ?? A display of orders for the particular CLEC that involve integrated facilities.
- ?? A workflow system that coordinates work between the RCCC, Central Office Frame, and the particular CLEC.
- ?? A reporting system for displaying statistics about Hot Cut orders.
- ?? A messaging system for direct communication between the particular CLEC and the RCCC.

The WPTS Hot Cut Web-Based System performs the following functions:

- ?? Automatically retrieves Hot Cut orders from the Verizon Systems on a near real-time basis.
- ?? Automatically forwards the work for review and verification to the particular CLEC and the RCCC.
- ?? With human interaction by the particular CLEC, sends order verify notification to the RCCC.
- ?? With human interaction by the particular CLEC, the Verizon MA RCCC and CO Frame Teams, tracks the progress of the dial tone check, dial tone FIXED, CLEC go ahead, Central Office Frame Cut Completion, and CLEC Confirm notification.

The WPTS Hot Cut Web-based System is:

- ?? A secure, CLEC-specific web site for displaying information/status of Hot Cut orders for the particular CLEC.
- ?? A browser-based workflow system that coordinates work between the RCCC, Frame, and the particular CLEC.
- ?? A messaging system for direct interactive communication between the RCCC, Frame and the particular CLEC.

WPTS gives the CLEC the ability to “self-verify” its orders to insure that the work they expect to be done (based on the order placed to Verizon MA by its ordering team) is, in fact, exactly what Verizon MA plans to perform. WPTS also tracks the progress of the Verizon MA CO Frame Tech’s Dial Tone Check and the CLEC’s Dial Tone Fixed communications (if necessary). Further, no phone call is required for the CLEC to convey the “Go Ahead” message to Verizon MA RCCC and CO Frame teams one hour before the slated date and time due. Finally, the “Central Office Frame Cut Completion” and “CLEC Acknowledgement Notification” are accomplished through web-based communications – rather than phone calls.

Equipment and training requirements for CLECs are extremely simple. Generally available PC Desktop equipment with Internet access is the only equipment required for a CLEC to access WPTS. Training for CLEC users of WPTS is available from Verizon MA – at no cost to the CLEC. Both equipment requirements and training are a part of the CLEC Certification process for WPTS

#### The 8 Steps to CLEC Certification for the WPTS Hot Cut

In order to take advantage of the WPTS Hot Cut pricing, the CLEC need only follow a simple series of eight steps to become a certified WPTS User, taking only 30-90 days to complete. The costs associated with these 8 steps that are incurred by Verizon MA have not been modeled in the NRCM nor are they included in the cost of Option II Hot Cuts.

1. CLEC completes the WPTS Survey. The WPTS survey is a general questionnaire that will provide Verizon MA basic information about potential WPTS users. CLECs must complete and submit the survey to begin the process. The CLEC must designate a Single Point of Contact (“SPOC”) for all WPTS communications. Verizon MA will email an acknowledgement of the survey receipt within 2 business days of submission.
2. Verizon MA will review the WPTS survey for system compliance and contact the CLEC SPOC within 7 business days.

3. Verizon MA recommends that CLECs review the WPTS Online Training application to assist in determining training needs for their organization.
4. After reviewing the Online Training, the CLEC SPOC will develop a training schedule with Verizon MA within 14 business days after submitting the WPTS Survey.
5. The CLEC SPOC must complete and submit the Initial WPTS Access Request form in order for the CLEC to obtain access to the WPTS application; the Access Request form must be completed in its entirety and submitted 10 business days prior to the first scheduled training date.
6. The CLEC SPOC is responsible for insuring that the CLEC's team has access to the associated WPTS training materials located on Verizon MA's WPTS Training site. The training site is organized into two separate functions as follows:
  - ?? The WPTS Online Training - This application details the WPTS Hot Cut process. The application also includes simulation of all interactive features.
  - ?? The Technical Guide - This guide provides trouble-shooting tips for accessing the Verizon Gateway URL to the WPTS system. This guide is designed to assist the CLEC's LAN Administrator in providing access for WPTS users.
7. The CLEC SPOC will insure that all user PC's meet WPTS technical requirements.
8. The CLEC SPOC will establish (with Verizon MA) a "go live" date, as of which the CLEC intends to begin using the WPTS application.

At the end of the Certification Process, the CLEC is a WPTS-certified CLEC. The only remaining step that makes the CLEC eligible to order the WPTS Hot Cut is agreement – in writing – to follow the WPTS Hot Cut Process. This process is identical to the Option I Verizon MA Hot Cut process with several key exceptions. They are:

- ?? Agreement to use WPTS as the communications vehicle associated with all routine communications surrounding the preparation and execution of Hot Cuts.
- ?? Agreement to be accountable for the following key trigger events and communications as a part of the WPTS Hot Cut process:
  - Pre-emptive verification of all orders through the WPTS system as well as prompt notification of Verizon MA's RCCC when problems are detected.
  - Pre-emptive recognition of all CLEC Dial Tone Problems (ie. No Dial Tone, Wrong Dial Tone) reported by Verizon MA CO Frame technicians

in WPTS. Prompt correction of such problems and prompt, pre-emptive notification of such corrective action to Verizon MA via WPTS.

- Pre-emptive communication of the “Go Ahead” or “No Go” message to Verizon MA by one hour before the scheduled data/time of a scheduled Hot Cut.
- Prompt, pre-emptive communication of the “Acknowledge Hotcut” message to Verizon MA within one hour after the completion of a Hot Cut. This message will signal the CLEC’s “acceptance” of the migrated end-user’s service.

#### Compliance Cost Study

Verizon MA has been able to utilize the expertise of key Subject Matter Experts (SMEs) to estimate the forward-looking impact of the new option on non-recurring costs. It is anticipated that the application of the WPTS process can significantly reduce the time required by the RCCC. Based on discussions with the SMEs, the total manual effort associated with Option II is estimated as 10% of the total connect time shown for the RCCC in all Hot Cuts, except IDLC to Copper Hot Cuts. For IDLC to Copper Hot Cuts, the total manual effort was estimated at 25%. In addition, two activities associated with the central office frame involved direct communication with the RCCC. In the case that the activity consisted solely of communications (i.e., receiving notification of a pending Hot Cut – Activity Number 1), the activity was zeroed out. In the case that the activity included checking for dial tone and reporting back to the RCCC (Activity Number 5), the activity time was halved. Furthermore, in recognition that the WPTS notification functionality could possibly some day be extended to the RCMAC, Verizon MA has halved work Activity Number 1 associated with the RCMAC, which entailed obtaining direct notification from the RCCC.